

dward

To: Mayuko.Morikita@jp.ul.com
Cc: customerservice; Naoki.Sakamoto@jp.ul.com; Tetsuo.Maeno@jp.ul.com;
Kenichi.Adachi@jp.ul.com
Subject: RE: FW: Response to Inquiry to FCC (TCB) FCC ID:JOYIUU19AC

Hi Mayuko

The frequency range between 1850-1910MHz is fine, but you have to resubmit all new test reports. The existing reports are not for this range as they contain frequencies above 1910MHz. Please provide a test report and ALL other documentation that specifically speak to this and only this range. Please note that following documentation that must be resubmitted to the appropriate range as they refer to the denied area as they are:

- 1 Test report – both as they both have the disallowed frequency range mentioned. which is denied
- 2 SAR report – it states the range as above 1910MHz. which is denied
- 3 SAR test data – it shows SAR data for 1919.6875MHz which is denied
- 4 Confidential_Specification[Confidential] – this also states operation above 1910MHz which is denied
- 5 Confidential_Operational_Description[Confidential] – this also shows operation above 1910MHz which is denied
- 6 Confidential_Antenna_Specification[Confidential] – shows operation above 1910MHz - which is denied
- 7 Block diagram – shows operation above 1910MHz which is denied
- 8 731 form shows operation above 1910MHz which is denied

Also, as previously mentioned, the use of this device in the 4 positions of a USB port in laptops is in question. Please note that the FCC said specifically that the horizontal and vertical positions of the laptop are to be tested. While I understand that the device swivels and thus does horizontal and vertical, I do not know if the FCC will accept this as adequate to show the actual laptop USB port orientation. While the SAR effect is probably the same, I do not know how the FCC will be on this aspect. Also, the SAR validation test frequency is said to be 2GHz but the solution is 1950. Why?

Once the new documentation is provided I will resubmit for PBA. Please also make sure that you have reviewed ALL documentation to remove any reference to use of the device above 1910MHz. Also, since this was at the FCC already, you should provide an attestation that the device will not operate above 1910MHz and provide an explanation as to how this device has been modified to prevent such operation.

Thanks

Dennis Ward

Director of Engineering

American TCB

Certification Resource for the Wireless Industry www.atcb.com

703-847-4700 fax 703-847-6888

direct - 703-880-4841

From: Mayuko.Morikita@jp.ul.com [mailto:Mayuko.Morikita@jp.ul.com]
Sent: Thursday, November 06, 2008 10:54 PM
To: Dennis Ward
Cc: customerservice; Naoki.Sakamoto@jp.ul.com; Tetsuo.Maeno@jp.ul.com; Kenichi.Adachi@jp.ul.com
Subject: Re: FW: Response to Inquiry to FCC (TCB) FCC ID:JOYIUU19AC

Dear Dennis,

We will change this application for frequency 1890-1910MHz range.
Applicant has the license for 1890-1895MHz and 1905-1910MHz.
1895-1905MHz will be used only in case they get the license in future.
Is it require application for 1895-1905MHz in this case also??

Please submit SAR test report to FCC and proceed PBA procedure.

If FCC require other issues, we will solve as soon as possible.
We will perform the test again, and we will send you the revised test report on November 11.

Best regards.

Mayuko Morikita (Ms.)
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Dennis Ward <dward@atcb.com>

To <Mayuko.Morikita@jp.ul.com>
cc 'customerservice' <customerservice@atcb.com>
Subject FW: Response to Inquiry to FCC (TCB) FCC ID:JOYIUU19AC

2008/11/07 02:03

Please respond to
<dward@atcb.com>

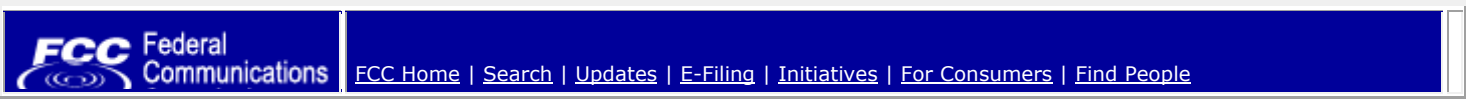
Hi Mayuko

The FCC has denied this application. I would suggest that if the device is desired to be certified that you change the frequency to stay within the 1850-1910MHz range. This would require retesting to that band. IF the applicant feels that the 1910-1920MHz is a valid band for this device then they should contact the wireless bureau and the licensing bureau and have them contact the OET so certification can be done. If you have or are aware of any other of these type devices certified in the 1910-1920MHz range then please let me know as they too are probably illegal and would have issue with the FCC.

Please read the response from the FCC below and let me know how you want to proceed.

Dennis Ward
Director of Engineering
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From: oetech@fccsun27w.fcc.gov [mailto:oetech@fccsun27w.fcc.gov]
Sent: Thursday, November 06, 2008 7:00 AM
To: hotline
Subject: Response to Inquiry to FCC (Tracking Number) (TCB)
Importance: High





Office of Engineering and Technology



Inquiry:

---Reply from Customer on 11/05/2008---

Gentlemen This application is under part 24E of the FCC rules in the 1890.3125 to 1919.6875MHz range. The range from 1910 to 1920 is under the ET (Emerging Technology) transition rule of Fixed Microwave Services in part 101 and specifically under 24.239 which states "Frequencies in the 1850?1990 MHz band listed in §101.147(c) of this chapter have been allocated for use by PCS." Please note however that part 24 of the FCC rules does in fact refer to a non-existent (actually a removed) section Part 101.47. The particular frequency allocations for ET is found in 101.69. Please refer to part 101.69 through 101.81. Part 101.69 states "Fixed Microwave Services (FMS) in the 1850?1990 MHz, 2110?2150 MHz, and 2160?2200 MHz bands have been allocated for use by emerging technology (ET) services, INCLUDING PERSONAL COMMUNICATIONS SERVICES (PCS), Advanced Wireless Services (AWS), and Mobile Satellite Services (MSS)." Please also note that while typically the 1910-1920 MHz range may be found under AWS, the rules do include Part 24E PCS. See referenced rule part above 24.239. The technical rules would be 24.238. Please also note that an existing service provider information for 802.20 (iBurst) has previously been provided to the FCC. This service provider is RTC Redwood Telephone Company out of Wabasso, MN.

Response:

The FCC has decided that you deny the PBA because it does not fit in any of the allocated frequency bands.

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.

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